

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA, <i>et al., ex rel.</i>	)	
JEFFREY H. LIEBMAN,	)	
	)	
Plaintiffs,	)	Civil Case No.: 3:17-cv-00902
	)	CHIEF JUDGE CRENSHAW
v.	)	
	)	
METHODIST LE BONHEUR HEALTHCARE,	)	<b>UNDER SEAL</b>
THE WEST CLINIC, WEST CANCER CENTER,	)	
UT METHODIST PHYSICIANS, LLC,	)	
METHODIST HEALTHCARE—MEMPHIS	)	
HOSPITALS and JOHN DOES 1-100,	)	
	)	
Defendants.	)	

**UNITED STATES' NOTICE REGARDING REPRESENTATION OF DEFENDANT**

The United States and the State of Tennessee, out of an abundance of caution, respectfully provide notice that they recently have learned that the law firm Waller Lansden Dortch & Davis, LLP represents Defendant West Clinic in the governments' investigation of this sealed *qui tam* action. Because Relator's *qui tam* is still under seal and the United States and State of Tennessee have not yet made a determination on whether to intervene in the *qui tam*, The West Clinic and its counsel are not aware of the existence of the *qui tam*. As a result, attorneys at Waller Lansden Dortch & Davis, LLP have not entered a notice of appearance with the Court.<sup>1</sup>

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<sup>1</sup> Plaintiffs have filed a similar notice in at least one other such matter in the past, and file this Notice in accord with that practice so that the Court is aware of the ongoing representation.

Respectfully submitted,

DONALD Q. COCHRAN  
United States Attorney  
Middle District of Tennessee

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*Counsel for the State of Tennessee*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of September, 2018, a copy of the foregoing Notice Regarding Representation of Defendant was filed by e-mail with the Clerk's Office per instruction of the Court. A service copy was served via First Class U.S. Mail, postage prepaid, on the following:

<p>Bryan A. Vroon Law Offices of Bryan A. Vroon, LLC 1380 West Paces Ferry Road Atlanta, GA 30327 Email: <a href="mailto:bryanvroon@gmail.com">bryanvroon@gmail.com</a></p>	<p>Edward D. Robertson, Jr. Bartimus, Frickleton &amp; Robertson 715 Swifts Highway Jefferson City, MO 65109 Email: <a href="mailto:chiprob@earthlink.net">chiprob@earthlink.net</a></p>
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Because this action is under seal pursuant to 31 U.S.C. §§ 3729-3733, as amended, Defendants have not been served with a copy of the foregoing Notice.

s/Christopher C. Sabis  
CHRISTOPHER C. SABIS  
Assistant United States Attorney